

RAE #8

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UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Tony Terrell Robinson,

Case No.: 0:17-CV-00437-DSD-KMM

Plaintiff,

vs.

Stephen Dannewitz, M.D., Advanced
Medical Imaging, Inc., Ranjiv Saini, M.D.,
Centurion of Minnesota, LLC, Jeanne
Luck, LPN,

**DEFENDANTS CENTURION
OF MINNESOTA, LLC AND
JEANNE L. LUCK, LPN'S
RESPONSES TO PLAINTIFF'S
THIRD SET OF
REQUESTS FOR DOCUMENTS**

Defendants.

TO: Plaintiff [*Pro Se*] Tony Terrell Robinson, Inmate ID: 18099-041, Federal Correctional Institution, P.O. Box 5000, Greenville, Illinois 62246-5000, and his attorney Zorislav R. Leyderman, The Law Office of Zorislav R. Leyderman, 222 South 9th Street, Suite 1600, Minneapolis, MN 55402.

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants Centurion of Minnesota, LLC and Jeanne Luck, LPN respond to Plaintiff's Third Set of Requests for Documents as follows:

RESPONSES TO REQUESTS FOR DOCUMENTS

REQUEST NO. 10: Produce all documents identified in any of your answers to interrogatories served upon you to date.

RESPONSE: Defendants object to this Request as untimely, because the Request was not commenced in time to be completed by the discovery cutoff date of March 14, 2020 (*See* ECF No. 185, 215). Subject to and without waiving any objections, any responsive documents in Defendants' possession have been produced.

REQUEST NO. 11: Produce any and all historical data maintained by Centurion of Minnesota, LLC regarding compliance with its own policies and procedures between 2011 to present.

RESPONSE: Defendants object to this Request as untimely, because the Request was not commenced in time to be completed by the discovery cutoff date of March 14, 2020 (See ECF No. 185, 215). Defendants further object to this Request as overly broad because the time at issue is between April 14, 2014 (the date of Plaintiff's injury) and May 8, 2014 (the date of Plaintiff's release). Defendants further object to this Request on the grounds that it is overbroad, not proportional or seeking relevant information, vague and lacking in definition, as it is unclear what Plaintiff means by the phrase "historical data" that would show Centurion's "compliance with its own policies." The production of all data or documents that show Centurion complying with various policies and procedures would also be unduly burdensome.

REQUEST NO. 12: Produce any and all written training materials provided to Jeanne Luck, LPN; Stephen Dannewitz, M.D. and any other medical personnel who came in contact with Robinson during the events described in the complaint. Robinson request these materials for the time frame of 2011 to present.

RESPONSE: Defendants object to this Request as untimely, because the Request was not commenced in time to be completed by the discovery cutoff date of March 14, 2020 (See ECF No. 185, 215). Defendants further object to this Request as overly broad because the time at issue is between April 14, 2014 (the date of Plaintiff's injury) and May 8, 2014 (the date of Plaintiff's release). Defendants further object to this Request on the grounds that it seeks irrelevant information, is not proportional to the needs of the case, is vague and lacking in definition, as it is unclear what Plaintiff means by the phrase "came in contact with Robinson."

REQUEST NO. 13: Produce any and all written policies in place by Centurion of Minnesota, LLC that pertains to medical care for inmates in the custody of Department of Corrections in Minnesota during the period 2011 to present.

RESPONSE: Defendants object to this Request as untimely, because the Request was not commenced in time to be completed by the discovery cutoff date of March 14, 2020 (See ECF No. 185, 215). Defendants further object to this Request as not seeking relevant information, not proportional, lacking in specificity, and as overly broad because the time at issue is between April 14, 2014 (the date of Plaintiff's injury) and May 8, 2014 (the date of Plaintiff's release).

Dated: March 27, 2020

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LK 1943613

MCF - Lino Lakes

CENTURION MONTHLY SCHEDULE

APRIL 2014

Sunday	Monday	Tuesday	1	Wednesday	2	Thursday	3	Friday	4	5
PCP		Dannewitz	8	Dannewitz	8					
NP/PA		Luck	8			Luck	8			
Psy										
NPP										
Phleb										
RT										
OPT										
Other										
6	7	8	9	10	11	12				
PCP										
NP/PA		Luck	8	Luck	8					
Psy										
NPP										
Phleb										
RT										
OPT										
Other										
13	14	15	16	17	18	19				
PCP										
NP/PA		Luck	8	Luck	8					
Psy										
NPP										
Phleb										
RT										
OPT										
Other										
20	21	22	23	24	25	26				
PCP	Dannewitz	16	Dannewitz	16	Dannewitz	16	Dannewitz	16	Dannewitz	16
NP/PA		Luck	8	Luck	8					
Psy										
NPP										
Phleb										
RT										
OPT										
Other										
27	28	29	30							
PCP	Dannewitz	16	Dannewitz	16	Dannewitz	16				
NP/PA		Luck	8	Luck	8					
Psy										
NPP										
Phleb										
RT										
OPT										
Other										
Totals										

Centurion000002

MCF - Lino Lakes

CENTURION MONTHLY SCHEDULE

May 2014

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				
Totals						

Centurion000003